



March 26, 2014

Land Use Files: CSU-13-15, VR-14-01

NOTICE OF DECISION

This is official notice of action taken by the Milwaukie Planning Commission on March 25, 2014.

Applicant: North Clackamas School District
Location: SE Lake Rd at 28th Ave
Tax Lot: 1S1E36CA, Taxlot 1200
Application Types: Community Service Use, Variance Request
Proposal: Replace existing outdoor batting cage with new indoor hitting facility
Decision: Approved, with Conditions
Review Criteria: Milwaukie Zoning Ordinance:

- Section 19.904 Community Service Use
- Section 19.301 Low Density Residential Zones
- Chapter 19.500 Supplementary Development Regulations
- Chapter 19.600 Off-Street Parking and Loading
- Chapter 19.700 Public Facility Improvements
- Section 19.911 Variances
- Section 19.1006 Type III Review

Neighborhoods: Lake Road, Historic Milwaukie

Appeal period closes: 5:00 p.m., April 10, 2014

This notice is issued in accordance with Milwaukie Municipal Code (MMC) Section 19.1006 Type III Review. The complete case file for this application is available for review between 8:00 a.m. and 5:00 p.m. on regular business days at the Planning Department, Johnson Creek Facility, 6101 SE Johnson Creek Blvd. Please contact Brett Kelter, Associate Planner, at 503-786-7657 or kelterb@milwaukieoregon.gov, if you wish to view this case file.

This decision may be appealed by 5:00 p.m. on April 10, 2014, which is 15 days from the date of this decision. Only persons who submitted comments or made an appearance of record at the public hearing have standing to appeal the decision by filing a written appeal. An appeal of this decision would be heard by the Milwaukie City Council following the procedures of MMC Section 19.1010 Appeals. This decision will become final on the date above if no appeal is filed during the appeal period. Milwaukie Planning staff can provide information regarding forms, fees, and the appeal process at 503-786-7630 or planning@milwaukieoregon.gov.

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Per MMC Subsection 19.1001.7.E, this land use approval expires unless the applicant has: (1) obtained and paid for all necessary development permits and started construction within 2 years of land use approval, and (2) passed final inspection and/or obtained a certificate of occupancy within 4 years of land use approval. Extensions can be granted per MMC Section 19.908.

Findings in Support of Approval

1. The applicant, North Clackamas School District, has applied for approval to construct an indoor hitting facility at the Milwaukie High School sports field complex on SE Lake Road at SE 28th Avenue. The proposal involves a major modification to an existing community service use and includes a variance request to waive the requirement to bring the existing off-street parking area into full conformance with all applicable standards. This site is in the Residential R-7 Zone. The land use application file numbers are CSU-13-15 and VR-14-01.
2. The applicant proposes to remove an existing outdoor batting cage on the site and replace it with a 4,800-sq-ft building to be used as an indoor hitting facility in the same location. The proposal includes a variance request for an exemption from the requirement to bring the existing parking area into full compliance with the City's standards for off-street parking. The applicant asserts that this requirement creates an undue economic hardship and requests that no parking upgrades be required. If required, the applicant requests that such upgrades be limited to no more than 10% of the development permit value.

The proposed development includes removal of the existing outdoor batting cage, storage shed, storage container, and the associated concrete pads. A new single-story building, 40 ft by 120 ft in size, will be constructed adjacent to the existing batting cage and will be used as an indoor hitting facility. A new asphalt path will connect the north side of the new building with the existing asphalt path that extends across the site between the parking area and the athletic fields. The new building includes no indoor plumbing, and the only exterior illumination will be over the north-side door, which faces the interior of the larger site. Existing chain link fencing between the new building and the adjacent residential property at 2805 SE Lake Rd will be improved with sight-obscuring slats. The applicant has prepared a preliminary stormwater management report to demonstrate that the new structure will adequately treat associated runoff.

3. The proposal is subject to the following provisions of the Milwaukie Municipal Code (MMC):
 - MMC Section 19.904 Community Service Use
 - MMC Section 19.301 Low Density Residential Zones
 - MMC Chapter 19.500 Supplementary Development Regulations
 - MMC Chapter 19.600 Off-Street Parking and Loading
 - MMC Chapter 19.700 Public Facility Improvements
 - MMC Section 19.911 Variances
 - MMC Section 19.1006 Type III Review
4. The application has been processed and public notice provided in accordance with MMC Section 19.1006 Type III Review. A public hearing with the Planning Commission was held on March 25, 2014, as required by law.
5. The Planning Commission reviewed the application for compliance with the code sections listed in Finding 3.

The Planning Commission finds that code sections not addressed in these findings are not applicable to the decision.

6. MMC Section 19.904 Community Service Use

MMC 19.904 provides standards and procedures for review of applications for community service uses. These are uses that are not specifically allowed outright in most zoning districts but that address a public necessity or otherwise provide some public benefit. Community service uses may include schools, government buildings, hospitals, religious institutions, utilities, parks, or communication facilities.

- a. MMC 19.904.2 establishes applicability of the Community Service Use (CSU) regulations.

The proposed development is a new indoor hitting facility at the Milwaukie High School sports field complex on Lake Rd at 28th Ave. The sports field complex is a public recreational facility as identified in MMC 19.904.2.C. The Planning Commission finds that the standards of MMC 19.904 are applicable to the proposed development.

- b. MMC 19.904.3 establishes the review process for community service uses. Except for wireless communication facilities and minor modifications to existing community service uses, applications for community service uses are subject to Type III review (MMC 19.1006).

The proposed development is neither a wireless communication facility nor a minor modification to an existing community service use. As a major modification to an existing community service use, the proposed development is subject to the procedures for Type III review outlined in MMC 19.1006.

- c. MMC 19.904.4 establishes the following approval criteria for community service uses:

- (1) The building setback, height limitation, and off-street parking and similar requirements governing the size and location of development in the underlying zone are met. Where a specific standard is not proposed in the CSU, the standards of the underlying zone are met.

The subject property is zoned Residential R-7. Development standards for the R-7 zone are provided in MMC Table 19.301.4. The standards applicable to the proposed development are addressed in the following table:

Residential Zone R-7 Development Standards				
Standard	Requirement	Existing	Proposed	Staff Comment
Minimum Setbacks	20 ft (front, rear) 5 ft / 10 ft (side)	<i>Existing batting cage & shed:</i> 66 ft (front) >400 ft (rear) 80 ft (west side) >450 ft (east side)	<i>New building:</i> 150 ft (front) 260 ft (rear) 33 ft (west side) >460 ft (east side)	Complies with standard
Front Yard Minimum Vegetation	40% minimum	c.95%	>95%	Complies with standard

Residential Zone R-7 Development Standards				
Standard	Requirement	Existing	Proposed	Staff Comment
Off-Street Parking and Loading	Yes	39 spaces	39-40 spaces	No code standard for minimum parking quantity for athletic fields; existing parking area has some nonconformities
Height Restriction	2½ stories or 35 feet	c.10 ft	14 ft (to peak)	Complies with standard
Lot Coverage	30% maximum	0.95% coverage (4,284 sq ft)	1.7% coverage (7,692 sq ft)	Complies with standard
Minimum Vegetation	35% minimum	92.5% vegetation (415,240 sq ft)	91.4% vegetation (410,305 sq ft)	Complies with standard
Transportation Requirements	Yes	n/a	6.5 ft right-of-way dedication	As conditioned, proposal will comply

Based on the foregoing analysis and as conditioned, the Planning Commission finds that the proposed development meets the applicable development standards of the underlying R-7 zone.

- (2) Specific standards for the proposed uses as found in MMC 19.904.7-11 are met.

As a public recreational facility, the proposed development is subject to the relevant standards for facilities not covered by other subsections of the community service use regulations, provided in MMC 19.904.9. The standards of MMC 19.904.9 applicable to the proposed development are addressed as follows:

- (a) MMC 19.904.9.A requires that utilities, streets, or other improvements necessary for the public facility shall be provided by the agency constructing the use.

As discussed in Finding 9 and as conditioned, all necessary utilities and street improvements warranted by the proposed development will be provided by the applicant. This standard is met.

- (b) MMC 19.904.9.B encourages access to be provided on a collector street if practicable.

Access to the subject property is provided from Lake Rd, which is classified as an arterial street in the City's Transportation System Plan. Arterials are higher classification streets than collectors and have greater capacity to accommodate new trips. This standard is met.

- (c) MMC 19.904.9.C requires community service uses in residential zones to provide setbacks equal to two-thirds the height of the principal structure.

As noted in Finding 6-c-(1), the new building is 14 ft in height and will provide front, side, and rear setbacks of well over 10 ft. This standard is met.

- (d) MMC 19.904.9.E requires noise-generating equipment to be sound-buffered when adjacent to residential areas.

The proposal does not include any noise-generating equipment. As proposed, a system of netting installed within the building will prevent balls and bats from making noise against the walls. The building's enclosure of the existing outdoor batting practice activity will further reduce the sound level of the current activity on the site. This standard is met.

- (e) MMC 19.904.9.F requires lighting to be designed to avoid glare on adjacent residential uses and public streets.

As evidenced by the applicant's submittal materials, exterior lighting will be provided above the entrance at the north end of the new building, which faces the interior of the site. As proposed, the light fixture will direct light downward at the entrance itself and will not produce glare that will reach adjacent properties.

As addressed in Finding 7-c, a condition has been established to ensure that adequate lighting is provided for both the new walkway and the existing walkway that connects to the off-street parking area. As conditioned, walkway lighting will be directed onto the path to avoid casting glare onto adjacent residential properties.

As conditioned, this standard will be met.

- (f) MMC 19.904.9.G encourages hours and levels of operation to be adjusted to be compatible with adjacent uses where possible.

The subject property does not include any existing exterior lighting, so use of the existing facilities on the site is limited to daylight hours throughout the year. The new building will provide an indoor, contained space for the batting-practice activities that currently take place outside, which will reduce the sound level currently associated with the outdoor batting cage. The new building will also have electricity and could be used at any hour. The applicant has indicated that the new building will sometimes be used after dark.

MMC Subsection 8.08.030 defines "daytime period" as 7:00 a.m. to 10:00 p.m., and MMC Subsection 8.08.100.C establishes an exemption from enforcement of the City's noise ordinance for sounds caused by organized athletic or other group activities. With these provisions in mind, and considering that the new building will provide some sound dampening for the batting-practice activities within, the Planning Commission finds that it is reasonable to establish the allowable hours of use of the new building to be 7:00 a.m. to 10:00 p.m. daily.

As conditioned, the Planning Commission finds that the hours and levels of operation of the new building will be compatible with adjacent uses and that this standard will be met.

As conditioned, the Planning Commission finds that the proposed development will meet the applicable standards of MMC 19.904.9.

- (3) The hours and levels of operation of the proposed use are reasonably compatible with surrounding uses.

As discussed in Finding 6-c-(2)-(f), a condition has been established to ensure that the hours and levels of operation of the proposed development are reasonably compatible with surrounding uses.

As conditioned, the Planning Commission finds that this standard will be met.

- (4) The public benefits of the proposed use are greater than the negative impacts, if any, on the neighborhood.

As discussed in the applicant's submittal materials, recreational facilities such as the existing athletic fields and the indoor hitting facility proposed in this application provide a number of benefits for youth in particular and the larger community in general. The proposed development is not expected to generate significantly more traffic or overall parking demand than the current facility and will not otherwise interfere with the regular use of the athletic fields or negatively impact the neighborhood.

The Planning Commission finds that this standard is met.

- (5) The location is appropriate for the type of use proposed.

The subject property already includes an outdoor batting cage, which will be replaced by the proposed new indoor hitting facility in the same general location. The larger site includes two baseball fields and a practice field for soccer/football, so it is fully committed to athletic use. The new building will be located in a space between the various fields and will not physically interfere with the use of any of them.

The Planning Commission finds that this standard is met.

As conditioned, the Planning Commission finds that the proposed development will meet the approval criteria of MMC 19.904.4.

- d. MMC 19.904.5 establishes the procedures for reviewing community service uses.

- (1) MMC 19.904.5.A requires the Planning Commission to hold a public hearing to consider the establishment of new community service uses or major modification of existing community service uses. The Commission shall determine whether the proposed use meets the approval criteria of MMC 19.904.4.

The proposed development represents a major modification to a community service use, in the form of significant improvements to an existing public recreation facility. The Planning Commission held a public hearing on March 25, 2014, to evaluate the proposed community service use in the context of the approval criteria of MMC 19.904.4. This standard is met.

- (2) MMC 19.904.5.B establishes the types of conditions that the Planning Commission may impose on community service uses to ensure compatibility with other uses in the vicinity. Conditions may involve such aspects as hours or intensities of operation, measures to limit noise or glare, special yard setbacks, design of vehicle access points, and size or location of a building.

The Planning Commission has evaluated the proposed new indoor hitting facility finds that, between the applicant's proposal and the conditions established by the Planning Commission, any negative impacts of the proposed development will be sufficiently addressed and mitigated. In particular, as addressed in Finding 6-c-(2)-(f), a condition has been established to limit the normal use of the facility to the hours between 7:00 a.m. and 10:00 p.m. daily.

Other conditions have been established to ensure the proposal's compliance with other applicable criteria (such as for walkways and off-street parking) and not specifically for limiting the potential impacts of the proposal or ensuring compatibility with other uses in the vicinity.

As conditioned, the Planning Commission finds that the proposed development and the associated community service use will remain compatible with other uses in the vicinity.

- (3) MMC 19.904.5.C authorizes the Planning Director to approve minor modifications to an approved community service use through the Type I review process, subject to compliance with specific criteria.

The proposed development represents a major modification to the existing community service use.

The Planning Commission finds that MMC 19.904.5.C does not apply to this application.

As conditioned, the Planning Commission finds that the applicable standards of MMC 19.904.5 will be met.

- e. MMC 19.904.6 establishes the application requirements for community service uses, including a narrative describing the proposed use, maps showing the vicinity and existing uses, and detailed plans for the project.

The applicant's submittal materials include a narrative description of the proposed development, site plans, building elevations, and detailed plans for items such as landscaping and off-street parking improvements.

The Planning Commission finds that this standard is met.

As conditioned, the Planning Commission finds that the proposed development will meet all applicable standards of MMC 19.904 and is approvable as a major modification to a community service use.

7. MMC Chapter 19.500 Supplementary Development Regulations

MMC 19.500 establishes a variety of supplemental provisions related to development, including exceptions to yard requirements, standards for accessory structures, and site design standards.

a. MMC Subsection 19.501.2 Yard Exceptions

MMC 19.501.2 establishes yard requirements along certain major streets that are in addition to those yard requirements in the underlying zone. Along Lake Rd, the minimum required yard setback to any building is 30 ft from centerline, plus the standard R-7 front yard requirement of 20 ft.

The centerline of Lake Rd is approximately 36 ft from the subject property boundary, which renders moot the additional yard requirement of MMC 19.501.2. The proposed new building will be located over 150 ft from the property boundary along Lake Rd.

The Planning Commission finds that this standard is met.

b. MMC Subsection 19.502.1 General Provisions

MMC 19.502.1 establishes general requirements for accessory structures. Accessory structures shall not encroach upon or interfere with the use of any adjoining property or public right-of-way. Additionally, accessory structures shall not be located within

the required front yard but are otherwise allowed to be within 5 ft of side and rear property lines.

The proposed building is a structure that is accessory to the overall recreational use of the site. The new building will be located over 150 ft from the front property line along Lake Rd and approximately 33 ft from the nearest side property boundary (adjacent to 2805 SE Lake Rd). The new building will not encroach on any adjoining property.

The Planning Commission finds that the applicable standards of MMC 19.502.1 are met.

c. MMC Subsection 19.504.9 On-Site Walkways and Circulation

MMC 19.504.9 establishes site design standards for on-site pedestrian walkways and pathways to promote safe and convenient circulation within and through the site. On-site walkways should connect building entrances to one another as well as to adjacent public streets. Walkways should be reasonably direct, constructed of a hard-surface but permeable material, at least 5 ft wide, and lighted to an average of 0.5 footcandles. When existing sites are redeveloped or modified, they should be brought closer to conformance with these standards as practicable.

The subject property includes an existing asphalt walkway that is at least 5 ft wide and that connects the existing off-street parking area in the northwest corner of the site to the varsity baseball field in the southeast corner of the site. The proposed development includes construction of a 5-ft-wide permeable asphalt walkway that will connect the new building directly to the existing walkway along the northern edge of the site that leads to the existing parking area.

A floodlight above the northern entrance to the new building will illuminate a portion of the walkway. The applicant has not proposed any additional lighting for the walkway. MMC Subsection 19.504.9.A provides that redevelopment projects shall bring the site closer into conformance with the walkway requirements, to the greatest extent practicable. The Planning Commission finds that, because the new building is proposed to be used after dark, it is reasonable and necessary that the walkway be lighted to an average level of 0.5 footcandles between the building's north entrance and the parking area. A condition has been established to ensure that this standard will be met.

As conditioned, the Planning Commission finds that the standards of MMC 19.504.9 will be met.

As conditioned, the Planning Commission finds that the applicable standards of MMC 19.500 will be met.

8. MMC Chapter 19.600 Off-Street Parking and Loading

MMC 19.600 regulates off-street parking and loading areas on private property outside the public right-of-way. The purpose of these requirements includes providing adequate space for off-street parking, minimizing parking impacts to adjacent properties, and minimizing environmental impacts of parking areas.

a. MMC Section 19.602 Applicability

MMC 19.602 establishes the applicability of the provisions of MMC 19.600.

(1) MMC Subsection 19.602.1 General Applicability

MMC 19.602.1 provides that the regulations of MMC 19.600 apply to all off-street parking areas, whether required by the City as part of development or voluntarily installed for the convenience of users. Activity that is not described by MMC Subsections 19.602.3 or 19.602.4 is exempt from compliance with the provisions of MMC 19.600.

The subject property includes an existing off-street parking area. The proposed development is an activity that meets the applicability standards of MMC 19.602.3 (see Finding 8-a-(3)).

The Planning Commission finds that the proposed development is subject to the provisions of MMC 19.600.

(2) MMC Subsection 19.602.2 Maintenance Applicability

MMC 19.602.2 provides that property owners shall ensure conformance with the standards of MMC 19.600 with regard to ongoing maintenance, operations, and use of off-street parking areas. Any change to an existing off-street parking area shall not bring the area out of conformance, or further out of conformance if already nonconforming.

The proposed development includes a variance request to waive the requirement to improve the existing off-street parking area. If any improvements are required, the applicant has proposed improvements that are in conformance with the applicable standards of MMC 19.606, including stall dimensions and landscaping.

The Planning Commission finds that this standard is met.

(3) MMC Subsection 19.602.3 Applicability for Development and Change in Use Activity

MMC 19.602.3 establishes the applicability of MMC 19.600 to the proposed development. According to the provisions of MMC 19.602.3.A, development of a site that results in an increase of 100% or more of the existing structural footprint (not including structures that will be demolished as part of the project) is required to fully conform to the requirements of MMC 19.600. As per MMC 19.602.3.B, development that results in an increase of less than 100% of the existing structural footprint is only required to bring the existing off-street parking area closer into conformance with the standards of MMC 19.600.

The subject property is largely open space for athletic fields, though it currently includes a few small structures such as baseball dugouts, bleachers, and a concession stand. The total existing structural footprint is approximately 2,892 sq ft, not including the 1,392 sq ft of the existing outdoor batting cage and storage sheds that will be removed as part of this project. The proposed new building is 4,800 sq ft, which is well over 100% of the existing structural footprint on the site.

The Planning Commission finds that the proposed development triggers the applicability standard provided in MMC 19.602.3.A, which requires that the existing off-street parking area must be made fully compliant with the standards of MMC 19.600. However, the applicant has requested a variance to waive the applicability standard of MMC 19.602.3. The variance request is addressed and evaluated in Finding 10.

As per the conclusions established in Finding 10, the Planning Commission has approved a more limited version of the variance request, waiving the requirement to make the existing parking area fully compliant but requiring the applicant to bring the parking area closer into conformance with the standards of MMC 19.600, with improvements limited to no more than 10% of the value of the associated development permit, as established in MMC Subsection 19.602.5.B.

(4) MMC Subsection 19.602.5 Improvements to Existing Off-Street Parking and Loading Areas

MMC 19.602.5 establishes standards for improving nonconforming off-street parking areas, including a limitation on required improvements and a prioritized list of improvements when required.

As discussed in Finding 10, the applicant has requested a variance from the requirement to improve the existing off-street parking area. In approving a more limited version of the variance request, the Planning Commission has found that some improvement of the parking area is warranted and that required improvements shall be limited to no more than 10% of the value of the associated development permit as per MMC 19.602.5.B.

With Sheets 3.0 and 5.0 stamped received by the City on March 12, 2014, the applicant has proposed some limited improvements that would meet the guidelines established in MMC 19.602.5.C: restriping the existing off-street parking area, providing bicycle parking at the new building, and landscaping the existing buffers. In addition, the Planning Commission finds that it is reasonable and necessary to require lighting in a portion of the parking area, since the new building will be used after dark. A condition has been established to ensure that these limited improvements are provided and that the standards of MMC 19.602.5 are met in conjunction with the approved variance request.

As conditioned, the Planning Commission finds that the standards of MMC 19.602.5 will be met.

b. MMC Section 19.605 Vehicle Parking Quantity Requirements

MMC 19.605 establishes standards that are intended to ensure that development provides adequate vehicle parking based on estimated parking demand.

(1) MMC Subsection 19.605.1 Minimum and Maximum Requirements

MMC Table 19.605.1 provides minimum and maximum requirements for a range of different uses. MMC Subsection 19.605.2 establishes a process for modifying parking requirements and determining the requirements for uses not similar to those listed in the table.

As noted in Finding 8-a-(3), the proposed development triggers the requirement of MMC 19.602.3.A that the existing off-street parking area be made to fully conform to the standards of MMC 19.600. Conformance would normally involve a verification that the quantity of parking spaces provided falls within the range allowed for the use in MMC Table 19.605.1. However, the applicant has requested a variance from the standard of MMC 19.602.3.A, and the Planning Commission has approved a limited version of the variance request to require only that the parking area be brought closer into conformance with the standards of MMC 19.600 (see Finding 10). As noted in Finding 8-a-(4), a condition has been established to require that certain prioritized improvements are made to

bring the parking area closer into conformance; but verifying the required number of spaces and changing the existing number of spaces are not required by the condition.

As conditioned, the Planning Commission finds that the standards of MMC 19.605.1 are not applicable to this application.

(2) MMC Subsection 19.605.4 Shared Parking

MMC 19.605.4 establishes provisions for sharing required parking spaces between uses, including a maximum allowed distance of separation.

The subject property currently provides 39 off-street parking spaces. In 2009, the applicant requested a variance to allow those spaces to be counted toward the total number (341 spaces) needed by the Milwaukie High School main campus to meet its minimum off-street parking requirement. The variance was required because the parking area on the subject property is farther away from the main campus (1,300 ft to 1,500 ft) than the distance allowed by the code in place that time (300 ft). The Planning Commission approved the variance request and the spaces were allowed to count toward the total needed for the main campus. At that time, the zoning code did not require a formal, recorded shared parking agreement and both the main campus and the subject property were owned by the applicant (the school district).

The applicant has not proposed to reduce the number of off-street parking spaces provided on the subject property, so the number of spaces available to the main campus will not change as a result of the proposed development. Since 2009, the allowed separation distance between shared parking spaces and the shared use has increased to 1,000 ft, but the need for the 2009 variance request remains relevant, as does the main campus's need to count the 39 spaces on the subject property toward the total 341 needed for the main campus.

The Planning Commission finds that the proposed development remains consistent with the standards of MMC 19.605.4.

c. MMC Section 19.606 Parking Area Design and Landscaping

MMC 19.606 establishes standards to ensure that off-street parking areas are safe, environmentally sound, aesthetically pleasing, and have efficient circulation.

(1) MMC Subsection 19.606.1 Parking Space and Aisle Dimensions

MMC Table 19.606.1 provides minimum dimensional standards for off-street parking spaces based on angle. For 90-degree (perpendicular) spaces, spaces must be at least 9 ft wide, 18 ft deep, and with a 22-ft drive aisle.

The existing striping of stalls in the off-street parking area is faded and in need of refreshing, the 39 spaces in the parking area all meet the minimum dimensional requirements of 9 ft by 18 ft, with a drive aisle more than 22 ft wide. As discussed in Finding 10-c, a condition has been established to require limited improvements to the parking area, including restriping in accordance with the standards of MMC 19.606.1.

As conditioned, the Planning Commission finds that this standard will be met.

(2) MMC Subsection 19.606.2 Landscaping

MMC 19.606.2 provides standards for off-street parking lot landscaping, including perimeter and interior landscaping. Within perimeter buffer areas, 1 tree is required to be planted every 40 lineal feet. In addition, for planting areas adjacent to residential areas, a continuous visual screen (fencing or plantings) is required from 1 to 4 ft above the ground to adequately screen vehicle lights. Interior landscaping is required at the rate of 25 sq ft for each parking space, with interior planting areas at least 120 sq ft in area and dispersed throughout the parking area.

The applicant has requested a variance from the requirement of MMC 19.602.3.A to bring the existing off-street parking area into conformance with the standards of MMC 19.600. As discussed in Finding 10-c, the Planning Commission approves a limited version of the variance request and has established a condition to require some improvements to the existing parking area. The required improvements include perimeter landscaping as per the standards of MMC Subsection 19.606.2.C; no new interior landscaping is required.

As conditioned, the Planning Commission finds that this standard will be met.

(3) MMC Subsection 19.606.3 Additional Design Standards

MMC 19.606.3 provides standards for paving, striping, wheel stops, drive aisles, pedestrian access and circulation, and lighting.

The existing off-street parking area is paved and striped, though the current striping pattern is faded and difficult to see. A condition has been established to ensure that the existing spaces will be restriped as proposed. There is an existing curb that serves the function of wheel stops without reducing the minimum required width of adjacent landscape areas. The drive aisle is over 25 ft wide, which exceeds the 22-ft minimum required for perpendicular spaces.

There is no clearly marked pedestrian access through the parking area, and to establish a separate pedestrian pathway would require a more significant reconfiguration of the parking area than the Planning Commission finds is warranted by the proposed development (as addressed in Finding 10-c-(2)).

The parking area currently has no lighting. The Planning Commission finds that, because the new building is proposed to be used after dark, it is reasonable and necessary to provide some lighting for the existing off-street parking area. A condition has been established to require lighting a portion of the parking area (the easternmost spaces abutting the athletic fields) to a 0.5-footcandle level as per the standards of MMC 19.606.3.F.

As conditioned, the Planning Commission finds that the standards of MMC 19.606.3 will either be met or are not triggered by the scale of the proposed development.

As conditioned, the Planning Commission finds that the applicable standards of MMC 19.606 will be met.

d. MMC Section 19.609 Bicycle Parking

MMC 19.609 provides standards for bicycle parking, including a minimum of two required spaces that are at least 2 ft by 6 ft in dimension and associated with a rack that allows for securing the frame and one wheel.

The applicant has requested a variance from the requirement to make any parking improvements. However, the Planning Commission has approved only a limited version of the variance request and is requiring some improvements to the existing parking area (see Finding 10-c). In the event that improvements were required, the applicant had proposed to install a two-space bike rack at one of the entrances to the new building. The Planning Commission finds that the proposed new bicycle parking is a reasonable and appropriate requirement in proportion to the scale of the proposed development. A condition has been established to ensure that the proposed bicycle parking will be provided according to the standards of MMC 19.609.

As conditioned, the Planning Commission finds that the standards of MMC 19.609 are met.

9. MMC Chapter 19.700 Public Facility Improvements

The purpose of MMC 19.700 is to ensure that development provides public facilities that are safe, convenient, and adequate in rough proportion to their public facility impacts.

a. MMC Section 19.702 Applicability

MMC 19.702 establishes the applicability of the provisions of MMC 19.700, including land divisions, new construction, expansions of existing structures, and changes or intensifications in use.

The proposed development consists of construction of a new structure that increases the vehicle trip generation to and from the site.

The Planning Commission finds that the proposed development is subject to the standards and requirements of MMC 19.700.

b. MMC Section 19.703 Review Process

MMC 19.703 establishes the review procedures for development that is subject to MMC 19.700.

(1) MMC Subsection 19.703.1 Preapplication Conference

MMC 19.703.1 requires a preapplication conference for all proposed development that is subject to MMC 19.700.

The Engineering Director has determined the proposed development is not complex and has waived the requirement for a preapplication conference. The proposed development complies with MMC 19.703.1.

(2) MMC Subsection 19.703.2 Application Submittal

MMC 19.703.2 establishes the requirements for submittal of either a development permit application or Transportation Facilities Review (TFR) application to demonstrate compliance with MMC 19.700. As per MMC Subsection 19.703.2.B, if a proposed development does not require a Transportation Impact Study (TIS) but does require another type of land use application(s), then a TFR application is not required and compliance with MMC 19.700 will be evaluated during the review of the other land use application(s).

The Engineering Director has determined that a TIS is not required as part of the proposed development in accordance with MMC Section 19.704. A TFR land use application is not required. The proposed development does require submission of other land use applications. Compliance with MMC 19.700 will be

reviewed during the review of the other land use applications. The proposed development complies with MMC 19.703.2.

(3) MMC Subsection 19.703.3 Approval Criteria

MMC 19.703.3 establishes the approval criteria for all proposed development subject to MMC 19.700.

Any required public facility improvements shall comply with the standards and requirements of MMC 19.700 and the Public Works Standards. The proposed development shall provide transportation improvements and mitigation at the time of development in rough proportion to the potential impacts of the development. As discussed in Finding 9-g, a condition has been established to ensure that this standard is met. The proposed development currently meets the safety and functionality standards of MMC Subsection 19.703.3.C. As conditioned, the proposed development will comply with MMC 19.703.3.

As conditioned, the Planning Commission finds that the proposed development will comply with the applicable standards of MMC 19.703.

c. MMC Section 19.704 Transportation Impact Evaluation

MMC 19.704 establishes the procedures for determining whether a proposed development requires a formal Transportation Impact Study (TIS). If required, a TIS evaluates the adequacy of the transportation system to serve the proposed development and determines the proportionate mitigation of impacts.

The Engineering Director has determined that the projected impacts to the transportation system, specifically the projected increase in trip generation, are not significant enough to require a TIS.

The Planning Commission finds that the proposed development complies with MMC 19.704.

d. MMC Section 19.705 Rough Proportionality

MMC 19.705 establishes standards to ensure that required transportation facility improvements are roughly proportional to the potential impacts of the proposed development.

The proposed development will add 4,800 sq ft of gross floor area. The impact to the adjacent transportation facility is calculated to increase by approximately 11%. As a result, the proposed development will be required to provide transportation facility improvements in proportion to this impact. Transportation facility requirements of MMC Section 19.708 do apply to the proposed development. As discussed in Finding 9-g, a condition has been established to ensure that the applicable standards will be met.

As conditioned, the Planning Commission finds that the proposed development will comply with MMC 19.705.

e. MMC Section 19.706 Fee In Lieu of Construction

MMC 19.706 establishes provisions to allow payment of a fee in lieu of constructing required transportation facility improvements.

As determined in MMC 19.705, the proposed development is subject to right-of-way dedication to mitigate the transportation impacts of the proposed development.

The Planning Commission finds that the requirements of MMC 19.706 do not apply to the proposed development.

f. MMC Section 19.707 Agency Notification and Coordinated Review

MMC 19.707 outlines the procedures for providing notice of a proposed development to other agencies when MMC 19.700 is applicable.

The proposed development is within 200 ft of Lake Rd, a designated arterial and transit route. Notice of the land use application has been provided to Metro, Clackamas County, and TriMet for their review and comment.

The proposed development complies with MMC 19.707.

g. MMC Section 19.708 Transportation Facility Requirements

MMC 19.708 establishes the City's requirements and standards for improvements to public streets, including pedestrian, bicycle, and transit facilities. These include requirements for access management, clear vision, development in non-downtown zones, street layout and connectivity, and intersection design and spacing. Transportation facility improvements are subject to the requirements of the Milwaukie Downtown and Riverfront Plan: Public Area Requirements.

As determined in Finding 9-d, the proposed development is required to mitigate the transportation impacts of the proposed development.

As noted in Finding 9-f, Lake Rd is an arterial roadway. According to MMC Table 19.708.2, an arterial roadway shall have right of way width between 59 ft and 89 ft. To accommodate an arterial cross section with two lanes of travel, center turn lane, bike lanes, planter strip, and setback sidewalk, this section of Lake Rd shall have a right-of-way width of 73 ft. The current right-of-way width on Lake Rd is 60 ft. The applicant is required to dedicate half the required right-of-way, 6.5 ft, along the proposed development property. A condition has been established to ensure that this standard is met.

As discussed in Finding 9-d, the proposed development increases trip generation by approximately 11%. The proposed development site has approximately 550 ft of frontage along Lake Rd. The right-of-way dedication along the entire frontage results in approximately 3,575 sq ft of dedication. The value of land dedicated is roughly proportional to the value of mitigation needed to offset the impact from the proposed development.

As conditioned, the Planning Commission finds that the proposed development will comply with MMC 19.708.

h. MMC Section 19.709 Public Utility Requirements

MMC 19.709 establishes standards to determine whether existing public utilities are adequate to serve a proposed development, as well as to determine whether new or expanded public utilities are warranted to ensure compliance with the City's public utility requirements and standards.

The Engineering Director has determined that the existing public utilities are adequate to serve the proposed development.

The Planning Commission finds that the proposed development complies with MMC 19.709.

As conditioned, the Planning Commission finds that the proposed development will comply with all applicable standards of MMC 19.700.

10. MMC Section 19.911 Variances

MMC 19.911 establishes the process and criteria for variance requests, which provide an opportunity for relief from specific code provisions that may have the unintended effect of preventing reasonable development or imposing undue hardship.

a. MMC Subsection 19.911.2 Applicability

MMC 19.911.2 establishes applicability standards for variance requests. Variances may be requested to any standard of MMC Title 19 Zoning, provided the request is not specifically listed as ineligible in MMC Subsection 19.911.2.B.

The applicant has requested a variance to exempt the proposed development from the requirement to bring the existing off-street parking area fully into conformance with the applicable standards of MMC Chapter 19.600 Off-Street Parking and Loading. The applicant has requested that (1) there be no improvements required to the existing parking area, and (2) if any improvements are required, that they be limited to no more than 10% of the project's development permit value.

The request would not eliminate the restriction on a prohibited activity, change a required review type, change or omit the steps of a procedure, allow a use not allowed outright in the underlying R-7 zone, or otherwise produce any of the results listed in MMC 19.911.2.B. The request is eligible for a variance as per MMC 19.911.2.

b. MMC Subsection 19.911.3 Review Process

MMC Subsection 19.911.3 establishes review processes for different types of variances. There is a Type II review process for limited variations to numerical standards and a Type III review process for more complex variations to standards that require additional discretion.

The applicant has requested a variance to waive or otherwise adjust the off-street parking requirements established in MMC 19.600. The variance request does not fall into any of the nondiscretionary categories outlined in MMC 19.911.3.B that would allow it to be processed with Type II review. Therefore, as per MMC 19.911.3, the request must be processed with Type III review pursuant to MMC Section 19.1006.

c. MMC Subsection 19.911.4 Approval Criteria

MMC 19.911.4 establishes approval criteria for variance requests. Specifically, MMC 19.911.4.B provides approval criteria for Type III variances, including criteria for standard discretionary relief as well as criteria for economic hardship.

The applicant has requested a variance based on economic hardship and has addressed the associated criteria established in MMC Subsection 19.911.4.B.2. However, the Planning Commission finds that the requested variance is more accurately and appropriately evaluated through the standard discretionary relief criteria established in MMC Subsection 19.911.4.B.1:

- (1) The applicant's alternatives analysis provides, at a minimum, an analysis of the impacts and benefits of the variance proposal as compared to the baseline code requirements.

Although the applicant did not provide a formal alternatives analysis (because the applicant addressed the approval criteria provided in MMC 19.911.4.B.2),

the Planning Commission has evaluated the impacts and benefits of the requested variance as compared to the baseline code requirements.

The sports field complex was originally approved in 1971 as a conditional use on the site, independent of the larger high school campus (land use file C-71-09). However, the subject property is in fact a functional part of the Milwaukie High School campus. The athletic fields are used regularly by the school's sports teams, and the parking spaces are designed for shared use with the main campus. The main campus does not provide enough space to establish a similar facility to the one proposed without removing existing facilities or parking, and there are no other available vacant properties nearby that are large enough to accommodate the proposed new building.

If the subject property was physically part of the larger campus of Milwaukie High School, then the proposal to add 4,800 sq ft of new structural footprint would present an increase of far less than 100% of the existing structural footprint for the whole site. In that case, the project would trigger the applicability standard in MMC 19.602.3.B, which requires only limited improvements to the existing parking area, instead of triggering the standard in MMC 19.602.3.A, which requires full conformance.

The subject property is primarily open space in the form of athletic fields. The only existing structures there are baseball dugouts, bleachers, storage sheds, and a concession stand building, which have a combined area of less than 3,000 sq ft. The applicability threshold in MMC 19.602.3 involves structural footprint, which effectively ignores the thousands of square feet of open space that are actively used for athletic activities on the site. In terms of site function, the proposed new building represents an increase of far less than 100% of the square footage of actively used space on the site. The Planning Commission finds that it is reasonable to consider the proposed development as one that effectively increases the footprint of activity on the site by less than 100%.

The requirement to bring the existing parking area fully into conformance with the standards of MMC 19.600 would require a parking determination to establish the minimum and maximum number of spaces required for the use on the site (athletic fields), which is not listed in MMC Table 19.605.1. It would also require extensive landscaping modifications, including installation of new interior landscaping that would in turn reduce the number of spaces. Because the main high school campus is dependent on the 39 spaces currently provided at the subject property in order to provide the minimum 341 spaces required for the school, removing any spaces at the subject property means they must be replaced—unless the main campus finds more spaces elsewhere or unless the applicant analyzes the parking demand and demonstrates that fewer spaces are needed for the subject property.

With the proposed development, the overall pattern and intensity of use of the site will change from the current situation. The proposed development will replace an existing outdoor batting facility on the site. The new facility will be usable at times when the existing facility is not, and it is much larger in size than the existing facility. However, the nature of the baseball and softball seasons is such that the new facility will rarely be used at the same time the rest of the athletic fields are in use. Those changes in intensity and pattern of use of the site do not represent an increase in overall parking demand or a significant

enough change to the overall use of the site to warrant requiring full compliance with the off-street parking standards of MMC 19.600.

The benefits of approving a more limited version of the requested variance include the retention of a requirement for some improvements to the existing parking area that are more in proportion to the anticipated impacts than those that would otherwise be necessary to achieve full conformance with the standards of MMC 19.600.

The Planning Commission has conducted an analysis of impacts and benefits of approving the requested variance and finds that the benefits do outweigh the impacts. This standard is met.

- (2) The proposed variance is determined by the Planning Commission to be both reasonable and appropriate, and it meets one or more of the following criteria:
- (a) The proposed variance avoids or minimizes impacts to surrounding properties.
 - (b) The proposed variance has desirable public benefits.
 - (c) The proposed variance responds to the existing built or natural environment in a creative and sensitive manner.

The applicant has requested a variance to the requirement that the existing parking area be brought fully into conformance with the standards of MMC 19.600. More specifically, the applicant has argued that no improvements should be required, asserting that the existing parking area functions adequately and that the proposed development will not increase the intensity of use of the site.

As discussed in Finding 10-c-(1), the Planning Commission agrees that the impacts of the proposed development do not warrant a requirement to make the existing parking fully compliant with the standards of MMC 19.600. However, the Planning Commission finds that the proposed development will change the intensity and pattern of use of the site and that it is therefore reasonable to require limited improvements to the existing parking area.

The parking area has several nonconformities with respect to the landscaping and design standards of MMC 19.606. The perimeter buffer areas do not include any trees as required (1 tree per 40 lineal feet). There are no interior landscaping areas and no lighting. Although a pedestrian walkway is striped within the accessway from Lake Rd, there is no marked pedestrian walkway within the parking area itself that would connect it with the on-site walkway leading to the fields.

The provision of interior landscaping would result in the loss of one or more spaces, which would have to be replaced in order to maintain the minimum required parking for the main high school campus, and would therefore require an expansion of the existing parking area. The Planning Commission finds that the scale of such an expansion is out of proportion with the scale of the proposed development. A condition has been established to require more limited improvements to the parking area, including striping, perimeter landscaping, bicycle parking, and lighting.

Given that the proposed development does not represent an increase in overall parking demand (as discussed in Finding 10-c-(1)), the Planning Commission finds that approving a limited version of the requested variance does not

necessarily result in any new negative impacts for adjacent properties beyond those that may currently result from use of the site. Furthermore, the Planning Commission finds that there is a public benefit to approving a variance from the requirement for the existing parking area to be made fully compliant with the standards of MMC 19.600, in that the public school district is spared the expense of providing improvements that are not proportional to the impact of the proposed development.

As conditioned, the Planning Commission finds that the approved variance is both reasonable and appropriate, and that it meets at least one of the criteria established in MMC 19.911.4.B.1.b. As conditioned, this standard will be met.

- (3) Impacts from the proposed variance will be mitigated to the extent practicable.

As discussed in Finding 10-c-(2), the approved variance request will not result in any new significant impacts. Although the existing off-street parking area will remain out of conformance with the standards of MMC 19.600, future redevelopment or modifications on the site may provide opportunities to bring the parking area closer into conformance. In the meantime, however, the improvements required as a condition by the Planning Commission will provide landscape screening of the parking area from adjacent properties, bicycle parking adjacent to the new building, and lighting that complements the lighting to be provided for the walkway to the new building. Additional trees that will be provided along the eastern side of the parking area will substitute for the interior landscaping that would otherwise have been required and will provide shading on that side of the parking area.

As conditioned, the Planning Commission finds that the impacts from the approved variance will be mitigated to the extent practicable.

As conditioned, the Planning Commission finds that a more limited version of the requested variance meets the approval criteria for discretionary relief, as provided in MMC 19.911.4.B.1.

The Planning Commission approves a more limited version of the variance request, with conditions to require some improvements to the existing parking area that will ensure that the variance is the minimum necessary and that any impacts from the variance will be mitigated to the extent practicable.

11. MMC Section 19.906 establishes applicability and requirements for the process of development review. As new development, the proposed development will be subject to the Type I process for development review, in conjunction with review of the associated building permit and/or any other development permits.
12. MMC Subsection 19.1001.7.E establishes expiration timelines for land use approvals. For land use decisions approved through the Type III review process, the approval shall expire and become void if the development does not complete both of the following steps:
 - a. Obtain and pay for all necessary development permits and start construction within 2 years of land use approval.
 - b. Pass final inspection and/or obtain a certificate of occupancy within 4 years of land use approval.
13. The application was referred to the following departments and agencies on February 11, 2014: Milwaukie Building Division, Milwaukie Engineering Department

- Milwaukie Building Division
- Milwaukie Engineering Department
- Clackamas Fire District
- Lake Road Neighborhood District Association (NDA) Chairperson and Land Use Committee
- Historic Milwaukie NDA Chairperson and Land Use Committee
- Clackamas County Engineering Department
- Oregon Department of Transportation (ODOT)
- Metro
- TriMet

The comments received are summarized as follows:

- a. **Brad Albert, Milwaukie Engineering Department:** Various comments related to MMC Chapter 19.700 Public Facility Improvements.
- b. **Paul Hawkins, Lake Road NDA (Land Use Committee Chair):** The Lake Road NDA supports the project.
- c. **Mike Boumann, Clackamas Fire District:** Various comments related to requirements for the proposed new building's proximity to fire department access and hydrants.
- d. **Yvonne and Tory McVay, 12951 SE Vernie Ave:** Involved with youth baseball; supportive of the project, particularly the applicant's request for a variance from the requirement to improve the off-street parking area; do not believe the proposed facility will increase parking demand at the site.
- e. **Pepi Anderson, 10080 SE 54th Ct:** Echoes the McVay's letter of support.
- f. **Charles Dean, 11222 SE Wood Ave:** President of Milwaukie Junior Baseball Association; supportive of the project and the variance request regarding parking improvements; believes the existing parking lot is sufficient for the needs of the proposed facility.
- g. **Bob Calwhite, 5177 Casa Del Rey Dr:** Supportive of the project and the variance request; does not believe the new facility will generate an increase in traffic or parking demand.
- h. **Kenneth Kent, Clackamas County Engineering Division:** No comments on this application.
- i. **Miranda Bateschell, Metro:** No comments on this application.
- j. **John Stelzenmueller, Milwaukie Building Department:** Various comments related to requirements of the building code, including emergency exits, ADA parking, plumbing, and energy efficiency.
- k. **Matt and Sarah Menely, 2816 SE Lake Rd:** Comments, questions, and suggestions related to several aspects of the proposed development—bathrooms, lighting, stormwater, security, parking, and hours of use.

Conditions of Approval

1. At the time of submission of the building permit application, the following shall be resolved:
 - a. Submit an application for Type I development review.
 - b. Final plans submitted for building permit review shall be in substantial conformance with plans approved by this action, which are the plans stamped received by the City on January 31, 2014, except with Sheets 3.0 and 5.0 stamped received by the City on March 12, 2014, and except as otherwise modified by these conditions. The required changes are as follows:
 - (1) As per Finding 8-d, revise the plan set to show bicycle parking for a minimum of two bikes at the new building, sufficient to meet the standards of MMC 19.609.
 - c. Provide a narrative describing all actions taken to comply with these conditions of approval.
 - d. Provide a narrative describing any changes made after the issuance of this land use decision that are not related to these conditions of approval.
2. Prior to issuance of the building permit, the following shall be resolved:
 - a. As per Finding 7-c, demonstrate that lighting will be provided for the on-site walkway between the new building and the existing off-street parking area in the northwest corner of the site. This section of walkway shall be lighted to an average 0.5-footcandle level in accordance with the standards of MMC 19.504.9.E. Walkway lighting shall be designed and directed to avoid glare onto adjacent residential properties.
 - b. As per Finding 8-c-(3), demonstrate that a portion of the existing off-street parking area (the easternmost spaces abutting the athletic fields) will be lighted to an average 0.5-footcandle level and shall comply with all applicable standards of MMC 19.606.3.F.
 - c. As per Finding 9-g, dedicate 6.5 feet of right-of-way on Lake Road fronting the proposed development property.
3. Prior to final inspection of any building permit, the following shall be resolved:
 - a. Submit a letter from the project landscape designer attesting that all required site plantings have been completed in conformance with the approved site plans and with City standards.
 - b. As per Finding 10-c-(2), demonstrate that the existing off-street parking area has been restriped to match the configuration shown on Sheet 5.0 (stamped received on March 12, 2014).
 - c. As per Finding 8-d, demonstrate that all required bicycle parking has been installed according to the standards of MMC 19.609.
 - d. As per Findings 7-c and 8-c-(3), demonstrate that all required lighting for the on-site walkway and off-street parking area has been installed and functions according to these conditions of approval.
 - e. Provide a narrative describing all actions taken to comply with these conditions of approval.
 - f. Provide a narrative describing any changes made after the issuance of this land use decision that are not related to these conditions of approval.

4. Ongoing conditions of approval:
 - a. As per MMC Subsection 19.606.2.E.3, required parking area landscaping shall be maintained in good and healthy condition.
 - b. As per Finding 6-c-(2)-(f), allowable hours of use for the new building shall be from 7:00 a.m. to 10:00 p.m. daily.

Other requirements

The following items are not conditions of approval necessary to meet applicable land use review criteria. They relate to other development standards and permitting requirements contained in the Milwaukie Municipal Code and Public Works Standards that are required at various point in the development and permitting process.

1. Prior to issuance of any building permit, the following shall be resolved:
 - a. Submit a storm water management plan prepared by a qualified professional engineer. The plan shall conform to Section 2 – Stormwater Design Standards of the City of Milwaukie Public Works Standards.
 - (1) The storm water management plan shall demonstrate that the post-development runoff does not exceed the pre-development, including any existing storm water management facilities serving the development site.
 - (2) The storm water management plan shall demonstrate compliance with water quality standards in accordance with the City of Portland Stormwater Management Manual.
2. Prior to commencement of any earth-disturbing activities, the applicant shall obtain an erosion control permit.
3. Development activity on the site shall be limited to 7:00 a.m. to 10:00 p.m. Monday through Friday and 8:00 a.m. to 5:00 p.m. Saturday and Sunday, per MMC Subsection 8.08.070(l).



Dennis Egner, AICP
Planning Director

cc: Garry Kryszak (c/o North Clackamas School Dist., 12451 SE Fuller Rd, Milwaukie 97222)
Keith Jones (c/o HHPR, 205 SE Spokane St, Suite 200, Portland 97202)
Planning Commission (*via e-mail*)
Steve Butler, Community Development Director (*via e-mail*)
Jason Rice, Engineering Director (*via e-mail*)
Philip Kolb, Engineering Technician II (*via e-mail*)
John Stelzenmueller, Building Official (*via e-mail*)
Bonnie Lanz, Permit Specialist (*via e-mail*)
Mike Boumann and Shawn Olson, Clackamas Fire District (*via e-mail*)
NDAs: Lake Road, Historic Milwaukie (*via e-mail*)
Interested Persons (*via e-mail*)
Land Use File(s): CSU-13-15, VR-14-01
Address File: Lake Rd & 28th Ave (MHS sports field site)